

BILZIN SUMBERG BAENA PRICE & AXELROD, LLP

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*Attorneys for Central Carillon Beach
Condominium Association, Inc.,
North Carillon Beach Condominium
Association, Inc., and South Carillon
Beach Condominium Association, Inc.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
FL 6801 SPIRITS LLC, <i>et al.</i> ,	:	Case No. 14-11691 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**VERIFIED STATEMENT OF BILZIN SUMBERG BAENA PRICE & AXELROD LLP,
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Bilzin Sumberg Baena Price & Axelrod LLP ("Bilzin Sumberg"), as counsel to North Carillon Beach Condominium Association, Inc. ("North Carillon Association"), Central Carillon Beach Condominium Association, Inc. ("Central Carillon Association"), and South Carillon Beach Condominium Association, Inc. ("South Carillon Association," and, collectively, with North Carillon Association and Central Carillon Association, the "Associations"), hereby submits this verified statement (the "Statement") required by Rule 2019(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and in support of this Statement respectfully states as follows:

1. The Associations retained Bilzin Sumberg to represent them in connection with the Chapter 11 cases of the above-captioned debtors (the “Debtors”). The Associations do not purport to act, represent, or speak on behalf of any other entities in connection with the Debtors’ Chapter 11 cases. As of the date hereof, Bilzin Sumberg does not represent or purport to represent any other entities with respect to the Debtors’ Chapter 11 cases. Bilzin Sumberg also holds no disclosable economic interests in the Debtors and has not filed a prior Rule 2019 Verified Statement in the Debtors’ Chapter 11 cases.

2. The Associations hold disclosable economic interests in relation to the Debtors. In accordance with Bankruptcy Rule 2019, and based upon information provided to Bilzin Sumberg by each Association, attached hereto as Exhibit A is a list of the names, addresses, and the nature and amount of each disclosable economic interest held by each of the Associations.

3. The Associations’ claims against the Debtors include, *inter alia*, litigation with respect to unauthorized assessments and improper redevelopment, as well as certain claims related to association dues. Bilzin Sumberg makes no representation regarding the amount, allowance, or priority of such claims, and reserves all rights with respect thereto.

4. On February 14, 2014, North Carillon Association filed a complaint against Debtors FL 6801 Collins North LLC, FL 6801 Collins Central LLC, and FL 6801 Collins South LLC in the Circuit Court for the 11th Judicial Circuit in and for Miami-Dade County, Florida (Case No. 2014-4356-CA-01) for, among other claims, improper redevelopment of the property commonly known as Canyon Ranch Hotel & Spa, Miami Beach.

5. On February 28, 2014, Central Carillon Association and South Carillon Association filed a complaint against Debtor FL 6801 Collins Central LLC, as well as Carillon Hotel and Spa Master Association, Inc. and North Carillon Association in the Circuit Court for

the 11th Judicial Circuit in and for Miami-Dade County, Florida (Case No. 2014-5408-CA-01) for, among other claims, damages related to unauthorized assessments by the Debtor defendant.

6. Each Association is listed as holding claims against the Debtors with respect to association dues on the Debtors' Consolidated List of 20 Largest Unsecured Claims. See Docket No. 1.

7. Nothing contained in this Statement (or **Exhibit A** attached hereto) is intended to, nor should be construed to, constitute: (i) a waiver of or release of any claims filed or to be filed against or interests in the Debtors held by any Association or any other entity; or (b) an admission with respect to any fact or legal theory. All other rights, claims, actions, defenses, setoffs, or recoupments to which the Associations are or may be entitled to under any agreements, in law or in equity are expressly reserved. Nothing in this Statement should be construed as a limitation upon, or waiver of, any rights of any Association to assert, file and/or amend any proof of claim in accordance with applicable law and any Orders entered in these Chapter 11 cases.

8. Bilzin Sumberg reserves the right to amend or supplement this Statement as necessary.

The undersigned hereby verifies under oath that this Statement is true and accurate to the best of the undersigned's knowledge and belief.

Dated: June 19, 2014

**BILZIN SUMBERG BAENA PRICE &
AXELROD LLP**

By: /s/ Scott L. Baena
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EXHIBIT A

Disclosable Economic Interests

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Disclosable Economic Interests (as of June 17, 2014)

NAME	ADDRESS	RELATIONSHIP TO DEBTORS	AMOUNT OF CLAIM	OTHER ECONOMIC INTERESTS
North Carillon Beach Condominium Association, Inc.	6899 Collins Avenue Miami Beach, Florida 33141	North Carillon Association is the condominium association that operates and governs the North Tower Condominium within the Canyon Ranch Miami Beach Community pursuant to the Declaration of Covenants, Restrictions and Easements for Carillon Hotel and Spa, dated November 2, 2007 (the " <u>Master Declaration</u> ") and the Declaration of North Carillon Beach, a Condominium, dated August 25, 2008.	Not less than \$20 million plus contingent and unliquidated amounts	Claims with respect to Association dues of no less than \$509.90
Central Carillon Beach Condominium Association, Inc.	6801 Collins Avenue Miami Beach, Florida 33141	Central Carillon Association is the condominium association that operates and governs the Central Tower Condominium within the Canyon Ranch Miami Beach Community pursuant to the Master Declaration and the Declaration of Central Carillon Beach, a Condominium, dated September 25, 2008.	Not less than \$20 million plus contingent and unliquidated amounts	Claims with respect to Association dues of no less than \$3,115.01
South Carillon Beach Condominium Association, Inc.	6799 Collins Avenue Miami Beach, Florida 33141	South Carillon Association is the condominium association that operates and governs the South Tower Condominium within the Canyon Ranch Miami Beach Community pursuant to the Master Declaration and the Declaration of South Carillon Beach, a Condominium, dated November 2, 2007.	Not less than \$20 million plus contingent and unliquidated amounts	Claims with respect to Association dues of no less than \$105.05